

PHILIP R. SELLINGER
United States Attorney
By: PETER A. LASERNA
Assistant United States Attorney
970 Broad Street, Suite 700
Newark, New Jersey 07102
Tel: (973) 645-2700
Peter.Laserna@usdoj.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Hon. Michael E. Farbiarz, U.S.D.J.

Plaintiff,

Civil Action No. 24-5863

v.

**THE CONTENTS OF THE
FOLLOWING ACCOUNTS:**

**NOTICE OF COMPLAINT
FOR FORFEITURE**

Electronically Filed

**JP MORGAN CHASE ACCOUNT
ENDING IN 9483 IN THE NAME OF
JAE CHOI ATTORNEY TRUST
ACCOUNT;**

**BANK OF AMERICA ACCOUNT
ENDING IN 4685 IN THE NAME OF
SMART LEARNING, INC.;**

**JP MORGAN CHASE ACCOUNT
ENDING IN 0711 IN THE NAME OF
HEE AH NAM;**

**TD BANK ACCOUNT ENDING IN
2483 IN THE NAME OF HEE AH
NAM;**

**TD BANK ACCOUNT ENDING IN
1237 IN THE NAME OF HEE AH
NAM;**

**BANK OF AMERICA ACCOUNT
ENDING IN 6030 IN THE NAME OF
HEE AH NAM;**

**BANK OF AMERICA ACCOUNT
ENDING IN 6043 IN THE NAME
OF HEE AH NAM;**

**JP MORGAN CHASE ACCOUNT
ENDING IN 9900 IN THE NAME
OF HUDSON ASSET HOLDING
CORP;**

**JP MORGAN CHASE ACCOUNT
ENDING IN 4413 IN THE NAME
OF HUDSON ASSET HOLDING
CORP;**

**JP MORGAN CHASE ACCOUNT
ENDING IN 0353 IN THE NAME
OF VIRTUA EDUCATION, INC.;**

**JP MORGAN CHASE ACCOUNT
ENDING IN 4827 IN THE NAME
OF VIRTUA EDUCATION, INC.;
AND**

**TD AMERITRADE ACCOUNT
ENDING IN 2857 IN THE NAME
OF HEE AH NAM; AND**

**THE REAL PROPERTY LOCATED
AT 125 13TH STREET,
CRESSKILL, NEW JERSEY,**

Defendants in rem.

TO: ALL PERSONS WITH A POTENTIAL INTEREST IN THE ABOVE-CAPTIONED PROPERTY

1. **FORFEITURE COMPLAINT:** On May 6, 2024, the United States of America filed a civil complaint seeking forfeiture, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 981(a)(1)(A) in the United States District Court for the District

of New Jersey, against the above-captioned property (collectively, the “defendant property”).

2. **FILING OF A VERIFIED CLAIM:** Pursuant to Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property must file a verified claim:

- If notice was mailed: No later than 35 days from the date of mailing of direct notice.
- If notice was personally served: No later than 35 days from the date of delivery.
- Within the time period that the Court allows, *provided that* any request for an extension of time from the Court is made prior to the expiration of the time within which the person is required to file such verified claim.
- If direct notice is *not* provided: Within 60 days from the first day of publication of notice on the government internet site www.forfeiture.gov.

3. **CONTENTS OF VERIFIED CLAIM:** Pursuant to Supplemental Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant’s interest in the property; (C) be signed by the claimant under penalty of perjury (*see* 28 U.S.C. § 1746); and (D) be served on the government attorney designated below.

4. **FILING OF AN ANSWER:** If you filed a verified claim, you must then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing the verified claim.

5. FILING WITH THE COURT AND SERVICE ON THE UNITED

STATES: The verified claim and answer must be filed:

- On the District of New Jersey's Case Management Electronic Filing System (CM/ECF), or
- With the Office of the Clerk, United States District Court for the District of New Jersey, Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Room 4015, Newark, New Jersey 07102.

In addition, a copy of the claim and answer or motion must be sent to Assistant United States Attorney Peter A. Laserna, United States Attorney's Office, District of New Jersey, 970 Broad Street, 7th Floor, Newark, New Jersey 07102.

Failure to follow the requirements set forth above may result in judgment by default taken against you, the forfeiture of the defendant property to the United States of America, and other relief demanded in the Complaint.

DATED this 8th day of May, 2024.

PHILIP R. SELLINGER
United States Attorney

s/Peter A. Laserna
By: PETER A. LASERNA
Assistant United States Attorney